



Industrial Telecommunications Association, Inc.

May 24, 1996

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OFFICE OF SECRETARY

Ms. Michele C. Farquhar
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

Dear Ms. Farquhar:

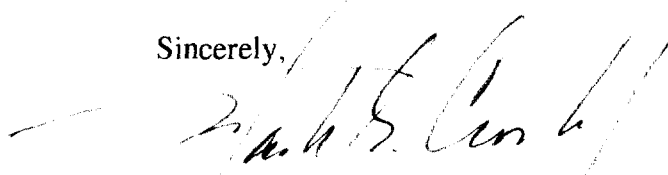
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The Industrial Telecommunications Association, Inc. (ITA), is pleased to submit its Business Plan to serve as the 2 GHz Microwave Relocation Cost-sharing Clearinghouse. We are most appreciative of the opportunity provided by the Bureau to participate during its designation deliberations.

ITA has carefully analyzed the clearinghouse requirements and the processes necessary to perform the associated functions. ITA has the organizational commitment, relevant wireless industry experience, resources, and professional qualifications to exceed the industry's expectations.

We are confident that our Business Plan fully meets the requirements and policy objectives of the Federal Communications Commission. Should you or Commercial Wireless Division personnel have any questions regarding ITA's Business Plan, please do not hesitate to contact me at any time.


Sincerely,


Mark E. Crosby
President/CEO

MEC:bjl

cc: Mr. David Furth, Chief
Commercial Wireless Division
Wireless Telecommunications Bureau

Ms. Sandra K. Danner, Chief of the Legal Branch
Commercial Wireless Division
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**BUSINESS PLAN
FOR THE
ADMINISTRATION
OF A
2 GHz MICROWAVE RELOCATION
COST-SHARING CLEARINGHOUSE**

**SUBMITTED IN RESPONSE
TO
FEDERAL COMMUNICATIONS COMMISSION
PUBLIC NOTICE DA 96-647
IN
WT DOCKET NO. 95-157**

**BY THE
INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION, INC.
1110 NORTH GLEBE ROAD, SUITE 500
ARLINGTON, VIRGINIA 22201-5720**

MAY 24, 1996

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EXECUTIVE SUMMARY

ITA has presented its Business Plan for the Administration of a 2 GHz Microwave Relocation Cost-sharing Clearinghouse in three parts, covering its Operational, Technical and Organizational approaches to the project.

In ITA's Operational Approach, Part A, we have addressed the critical requirements identified within the Wireless Telecommunication Bureau's Public Notice DA 96-647, released on April 25, 1996, and have presented mechanisms that would facilitate the simultaneous operation of multiple clearinghouses should the Bureau designate multiple entities. Although ITA is fully equipped to act as the clearinghouse organization, we believe that having multiple entities will promote industry balance and promote competition that will better serve the interests of the industry. Competition creates operational efficiency, the development of innovative services and competitive prices.

ITA will use its existing financial resources to commence operations. This approach supports the requirement for neutrality and produces incentives to craft services and processes that achieve maximum industry acceptance. ITA will commence operations on the data of Bureau designation. ITA will establish procedures to identify to the maximum extent possible premium payments for microwave relocation and has outlined procedures to resolve disputes concerned with this issue. ITA's dispute resolution approach commences with a

careful review of the cost components, proceeds to negotiated settlements and concludes with a mediation approach.

Part B presents ITA's Technical Approach to required clearinghouse functions. Our techniques fully conform with the procedures identified by the FCC within its Report and Order in WT Docket No. 95-157. The process commences with a Prior Relocator's registration when relevant relocation information is gathered; proceeds through the Later Entrant notification requirement, which incorporates application of the Proximity Threshold Test; and, essentially, concludes with the clearinghouse notification of the reimbursement obligation. This process incorporates the application of reimbursement caps; the microwave relocation depreciation schedule; and recognizes other unique matters associated with unlicensed PCS operations, private settlement agreements and alternative payment options available to designated entities and UTAM, Inc. A variety of exhibits are presented that are already under development to ensure expedited clearinghouse commencement and proficient operations.

ITA's Organizational Approach is contained within Part C, which codifies ITA's forty-three year history of providing spectrum management and associated services to the wireless industry. ITA has sub-contracted with Moffet, Larson & Johnson, Inc.'s Information Systems Division who are providing their unique technical expertise for purposes of product and software development.

A Clearinghouse Division (CHD) will be formed within the ITA organization to conduct the required activities. ITA's CHD will be staffed by professionals dedicated to the project and supported with equipment and associated resources to perform the activities efficiently and at minimum expense.

ITA is a non-profit District of Columbia-organized corporation and will apply stringent financial management and cost-accounting procedures to ensure that the clearinghouse activities are performed on a cost basis. A detailed description of anticipated expenses and revenues and a two-year projected financial statement are provided within ITA's Financial Approach.

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PART A — OPERATIONAL APPROACH

A.O Introduction

In its *Cost-Sharing Report and Order*, adopted April 25, 1996, the Federal Communications Commission delegated authority to select one or more entities for the creation and management of a "neutral, not-for-profit clearinghouse" to the Wireless Telecommunications Bureau (Bureau). In its Public Notice accompanying the *Order*, the Bureau announced it had tentatively concluded that one particular personal communications service association should be designated to administer the Commission's cost-sharing plan. While ITA acknowledges that it may not have been first in informing the FCC of its intention to serve, it too has "spent a considerable amount of time, money, and effort formulating" this business plan.

In Comments filed in response to WT Docket No. 95-157 on November 30, 1995, ITA urged the Commission to "open up the clearinghouse function to competitive bidding from all interested entities." ITA further stated that competitive bidding "would ensure that all competent entities have equal opportunity to fulfill this function ... would ensure that the function is performed without unnecessary expense (and) would provide an opportunity for interested organizations to develop meaningful, and possibly innovative, procedures that would best promote the reimbursement process."

We remain convinced that through competition — promoted by the Bureau selecting more than one capable and energetic entity — the Commission's clearinghouse objectives will be exceeded through the introduction of inventive and cost-effective services. ITA is fully qualified, however, to serve as the clearinghouse should the Bureau determine to select a single entity.

We are pleased that the Bureau has invited ITA, as well as those who had previously notified the agency of their intentions to serve, to submit a business plan. ITA needed no further encouragement and sincerely appreciates the significant opportunity presented by the Bureau. This part of ITA's business plan will address the specific requirements identified by the Bureau in its Public Notice.

A.1 Understanding the Requirement

In the *Emerging Technologies* proceeding (ET Docket No. 92-9), the FCC released its initial microwave relocation rules. In its *First Report and Order and Further Notice of Proposed Rule Making* in WT Docket No. 95-157, the FCC wisely amended certain components of its rules by specifically adopting a plan for sharing the associated costs for relocating microwave facilities. These microwave facilities may still be operating, or they may have already been relocated by a Block A or B PCS licensee within the 1850-1990 MHz (2 GHz) band, for which cost reimbursement may be possible from Block C licensees.

It is recognized that the reimbursement requirement will have numerous permutations, depending upon the PCS technology, system deployment, marketing and microwave negotiation strategies. For example, a Block A PCS licensee may receive relocation reimbursement from multiple PCS licensees across multiple markets and spectrum areas. A future Block D licensee may choose to relocate an existing microwave system and incur a "receivable" from one or more PCS licensees who entered the marketplace at an earlier date or from UTAM, Inc. And, depending upon the FCC's final decision in the subject *Further Notice of Proposed Rule Making*, 2 GHz microwave licensees may eventually choose to relocate themselves and receive reimbursement from one or more PCS licensees for such action.

Despite the complexity, a cost-sharing process must be undertaken to **expedite the clearing of the 2 GHz band in an equitable and efficient manner that will culminate in the rapid deployment of competitive PCS technology and services, thereby benefiting the American public.**

The FCC has conditioned its cost-sharing plan on the selection of one or more entities to administer this critical function. Outsourcing this activity conserves FCC resources, and prudent selection will place the function within one or more responsible organizations that are structured to provide impartial and confidential cost-sharing clearinghouse services. Additional requirements incorporate the provision of these activities in a timely manner, with transaction fees commensurate with the services provided.

Those selected by the FCC to perform cost-sharing clearinghouse functions on behalf of the expanding PCS licensee base must have the requisite knowledge of the financial and technical aspects of PCS system deployment and microwave relocation. This demands a dedicated professional staff that is fully conversant with all past and pending PCS regulatory and allocation decisions and equipped with a state-of-the-art management information system, PCS/microwave licensee records, and electronic information receipt/delivery resource capabilities to communicate efficiently with all participating entities.

Finally, the cost-sharing clearinghouse(s) selected by the Bureau must have administrative procedures in place to facilitate discussions to assist in the closure of financial liability disputes that may result during microwave relocation cost-sharing negotiations.

A.2 Multiple Clearinghouse Feasibility

The Bureau seeks comment on whether more than one clearinghouse would be feasible and, if it decides to designate multiple clearinghouses, what mechanisms should be implemented to facilitate their simultaneous operation.

A.2.1 Marketplace Balance

The PCS industry is a complex environment where there are a myriad of licensees vying for a personal voice and data market share. These licensees range

from large international telecommunications organizations to smaller newly-formed firms, all of whom are vying for a share of this incredible industry. The energy and effort to get to the marketplace first is intense

We also know that the FCC has concluded only three of its six PCS auctions, with Blocks D, E and F to be held after the clearinghouse selection process is concluded. Neither the Commission, ITA nor PCS industry associations can know who all the PCS licensees will be. Although tentatively proposed, it is also yet to be determined if the FCC will permit 2 GHz incumbent microwave licensees to relocate themselves, thereby incurring a reimbursement obligation. Consequently, representation of any particular segment of the PCS/microwave incumbent industry is not relevant in the selection process, for there are many players in the relocation process and many more yet to be identified.

There are multiple organizations representing the PCS industry, *e.g.* the Cellular Telecommunications Industry Association (CTIA) and the Personal Communications Industry Association (PCIA), and multiple organizations representing the primary number of private users of 2 GHz microwave facilities that are being relocated, *e.g.* the Association of American Railroads (AAR), Association of Public Safety Communications Officials-International, Inc. (APCO), American Petroleum Institute (API) and UTC, the Telecommunications Association (UTC). Significant representation by a clearinghouse toward any particular segment of either the PCS

industry or the microwave industry may serve inadvertently to skew the process in favor of one segment of the industry over another.

ITA believes that multiple clearinghouses will afford existing PCS licensees, potential microwave incumbents and soon-to-be PCS licensees a free marketplace choice. Multiple clearinghouses will clearly provide a balance to one another, as well as a balance in the marketplace for the performance of these critical functions and responsibilities.

A.2.2 Value of Competition

The FCC supports competition, for it promotes a number of desirable effects: operating efficiency; the desire to provide innovative services that are superior to one's competitors; a need to listen and respond favorably to the marketplace being served; fast and courteous service; and the provision of goods and services at competitive prices. The benefits that accrue from competition are equally applicable to the clearinghouse responsibility. Should the Bureau select ITA to serve as a clearinghouse, ITA will aggressively compete, while providing quality service to the industry.

The PCS/microwave relocation negotiation process has been contentious at times and is technically complex due to both PCS system deployment and microwave

relocation strategies. There are probably tens of thousands of PCS sites to be installed, and there remain thousands of microwave links to be relocated. Competition to provide a professional and efficient clearinghouse will assist this complex process, for the marketplace will gravitate to the entity that best serves its requirements.

It is not normally the FCC's practice today to guarantee business by awarding a monopoly, only the opportunity to succeed. Or, as Bureau Chief Michele Farquhar was quoted as saying in a *Wall Street Journal* article on May 20, 1996, "We offer no guarantee of success, only the opportunity to compete."

While the efforts of UTAM may appear to be similar, this situation is different, because PCS products are primarily nomadic in nature and **all** unlicensed PCS manufacturers (there are no licensees per se) have the identical goal. Moreover, UTAM needed to adopt an interference protection/resolution standard universally supported by the industry.

Any clearinghouse selected by the Bureau must be willing to assume the risk of losing its clearinghouse business investment. Should the Bureau select ITA to serve as a clearinghouse, ITA will assume the associated risks.

A.2.3 Facilitating Simultaneous Operation

The Bureau requested a description of the mechanisms that should be implemented to facilitate the simultaneous operation of multiple clearinghouses. There are several components that would ensure the successful operation of the cost-sharing relocation process should multiple clearinghouses be selected.

A.2.3.1 Organizational Integrity

The clearinghouses must understand and respect the fact that PCS licensees and potential microwave incumbents will freely select among competing organizations when choosing to register their reimbursement rights. This includes existing PCS licensees who have incurred (post-April 5, 1995), or are in the process of incurring, a reimbursement right; microwave incumbents; C-Block licensees; and future D-, E- and F-Block PCS licensees.

The clearinghouses selected must respect and recognize the requirement that they will need to exchange pertinent information and that information of a proprietary nature must be held in strict confidence. ITA suggests that the organizations selected need not require Commission oversight to conform with this necessity, and that the information exchanged may be transferred quite efficiently through mutually agreed upon electronic methods.

A.2.3.2 Required Information Exchange

PCS Relocator registration drives the feasibility of the shared clearinghouse opportunity. The critical data accompanying the registration is PCS identification information; the date of the executed relocation agreement; a cost breakdown of the microwave link relocation; and the total cost, excluding any premiums paid. This information will reside within one or another of the clearinghouse databases.

Later Entrants (who themselves may be a registering Relocator) may conduct ITA's Distributed Proximity Threshold Test (PTT), as proposed in Section B.4.1.2, or have a clearinghouse perform the PTT analysis following receipt of a Prior Coordination Notice (PCN). If the Later Entrant submits its request for reimbursement status to the clearinghouse with Relocator registration rights (refer to Exhibit B-3), there is no need to exchange data to conclude the financial transaction. If the Later Entrant submits its reimbursement status request to a clearinghouse that does not have Relocator registration rights (a decision determined by a previous registration or motivated by PCS competitive reasons), only then is there realistically created an obligation by the clearinghouse with Relocator registration rights to exchange registration information to conclude the financial transaction. It may be more prudent for administrative purposes, however, to exchange this information on a more regular basis, *e.g.* weekly.

The requirements for subsequent financial payment are identical in either instance, and clearinghouses will not be involved in handling any transaction funds. The procedures necessary to conduct PTTs are also identical and produce only an affirmative or a negative reimbursement-obligation outcome. The only information exchange required is simply a reimbursement-obligation notification.

Whether there are one or more clearinghouses, ITA suggests that the clearinghouse(s) and interested industry user associations adopt a standard format itemizing the actual cost components of a microwave relocation transaction to facilitate any relocation cost negotiations that may occur. For presentation purposes, ITA has developed a sample form, which is contained in Exhibit B-2.

A.2.3.3 Dispute Resolution

With multiple clearinghouses, ITA recommends that the clearinghouse with microwave link relocation registration rights serve as the principal entity responsible for dispute resolutions that may develop among PCS Relocators and Later Entrants over microwave reimbursement costs.

As recommended in Section A.2.3.2, respective clearinghouses will obviously know who their registrants are and will have been exchanging pertinent microwave relocation cost information based on registration rights.

A.2.3.4 Summary

Section A.2 presents an operational approach justifying the selection of more than one clearinghouse by the Bureau. In sum, having multiple entities serve as a clearinghouse promotes:

- ◆ Industry Balance — Existing and future PCS licensees and potential microwave licensees will have the liberty to choose a clearinghouse they believe is best suited to accommodate their requirements; and
- ◆ Competition — PCS and potential microwave licensees will file their registrations with the clearinghouse they believe offers confidential processing of their proprietary financial relocation information and PCS site-deployment data, expeditious processing, superior technical analysis capabilities and responsible dispute-resolution assistance at prices commensurate with the benefits received. Only the marketplace is equipped to make these determinations.

The mechanisms necessary for simultaneous operation depend on the integrity of the clearinghouses and an understanding of the critical components of the relocation cost-sharing process. With the exception of dispute resolution, the segments of the cost-sharing process are clearly defined and finite. PCS Relocator registration drives the feasibility and subsequent transaction accountability. What is

needed is a standard form or format that defines the cost breakdown of a microwave link relocation. This information must be shared among the clearinghouses.

ITA is convinced that if the Bureau selects multiple clearinghouses, those entities will cooperate out of mutual respect, will not lose sight of the overall constructive objective and will recognize the privilege afforded by the Bureau to serve in this unique capacity. The privilege to conduct a clearinghouse function should not be assumed as an inherent right but an assigned opportunity to perform based on a responsible business plan.

A.3 Financial Data

The Bureau requests that clearinghouse candidates address how they intend to raise start-up funds and how much they plan to charge for individual transactions. As presented in our Financial Approach, contained in Section C.4. we intend to utilize existing association financial resources to fund clearinghouse initiation activities. ITA will be using its substantial internal administrative, management information infrastructure and professional staff resources.

Moffet, Larson & Johnson, Inc. (MLJ), selected for the technical development-assistance role, will also be providing its resources and professional talents from within its existing corporate financial base.

ITA does not believe, at least for its purposes, that it is strategically prudent to secure developmental financial resources from industry segments, for it may create or present the appearance of obligatory responsibility. Our approach supports our neutrality and produces incentives to craft services and processes that achieve maximum acceptance and trust within the marketplace. While ITA will conduct the day-to-day business of the clearinghouse, ITA will utilize MLJ's technical capabilities in the industry to provide data, software and technical assistance.

ITA has presented its fees for Relocator registration, associated technical transactions and dispute resolution in Section C.4.2.1.

A.4 Timing

The Bureau requested information on how long it would take an organization to become operational and how long it would take a prospective clearinghouse to notify licensees of a reimbursement obligation.

A.4.1 Commencing Operations

As presented in Section C.3, Management Approach, the formation of ITA's Clearinghouse Division (CHD) will become operational on the date the Bureau selects ITA to function as a clearinghouse entity. All CHD personnel will be fully

knowledgeable of their responsibilities and will be prepared to perform them immediately. Work activities that would serve to encumber the immediate formation of the CHD will be reassigned within the ITA organization.

A.4.2 Relocator Registration

The CHD will accept Relocator registrations as soon as licensees choose to utilize ITA's CHD to process their reimbursement rights. Details regarding the administrative and cost-sharing financial database components of a relocator registration are discussed in detail in Part B — Technical Approach.

A.4.3 Reimbursement Obligation Notification

ITA's CHD will distribute Reimbursement Obligation Notifications within one business day following verification that it has all the necessary administrative, technical and financial information relevant to the particular microwave relocation transaction under consideration. Although there are multiple notification delivery methods that may be employed, *i.e.* U.S. mail, facsimile, Internet, etc., ITA will seek PCS Relocator transmittal preferences and verify notification receipt in all instances.

It is understood that there are a number of reimbursement rights that have already been created among Block A, B and C licensees and with UTAM. Again, upon registration and verification, notifications will be distributed within one business day. Similarly, once the FCC concludes its auction procedures for Blocks D, E and F and new PCS licensees are identified, Reimbursement Obligation Notifications will be transmitted to the new PCS entities within one business day.

A.4.4 Proximity Threshold Tests

Although the Bureau did not specifically request comment on the speed with which PTTs are to be conducted following receipt of PCNs, ITA's CHD will endeavor to process these analyses within 48 hours of receipt. Expedited processing is critical, for PTTs may determine the requirement for reimbursement depending upon base station location.

In Part B — Technical Approach, ITA presents a prototype PTT report, which contains the results of the technical analysis conducted. The report will also be used as a vehicle to identify reimbursement obligations and financial relocation reimbursement share.